

October 16, 2019

Elizabeth Adams, Director
Air Division
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street, AIR-7
San Francisco, California 94105

Dear Ms. Adams:

The California Air Resources Board (CARB) is submitting final documentation, including public comment documentation, for exceptional events that occurred in the Imperial County Air Pollution Control District (District). CARB requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the documents accompanying this request support the flagging of PM₁₀ exceedances in the Imperial County Air Pollution Control District (District) as natural or exceptional events due to high winds.

Unusually high PM₁₀ concentrations, exceeding the 24-hour National Ambient Air Quality Standard (NAAQS or standard) of 150 µg/m³, were recorded at various monitoring sites in the District on the following dates:

- February 17, 2017
- March 30, 2017
- May 6, 2017
- May 15, 2017
- May 25, 2017

The analyses and data presented in the accompanying documents demonstrate that without the high winds and entrained dust on each of these occurrences, concentrations measured at the monitoring sites would have been below the federal standard.

The 30-day public comment period required by 40 CFR 50.14(c)(3)(v) for these events was completed on September 6, 2019. In our letter of September 9, 2019, submitting the initial exceptional event documentation, we requested parallel processing under U.S. EPA's procedure cited in 40 CFR 51, Appendix V, Section 2.3. This process is needed to expedite U.S. EPA action on the Imperial County PM₁₀ Maintenance Plan and Redesignation Request.

No comments were received during the public comment period; the final documentation enclosed here includes statements to that effect as well as the affidavits of publication as required by 40 CFR 50.14(c)(3)(v).

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On October 3, 2016, U.S. EPA revised the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (81 FR 68216). This rule requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

If you have any questions regarding the enclosed documentation please contact Sylvia Vanderspek, Chief, Air Quality Planning Branch, at (916) 324-7163 or via email at sylvia.vanderspek@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Benjamin".

Dr. Michael T. Benjamin, Chief
Air Quality Planning and Science Division

Enclosure (CD)

cc: (without enclosure)

Mr. Matt Dessert
Air Pollution Control Officer
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